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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,
Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**TRUSTEE'S COUNTER-DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL AND COUNTER-STATEMENT OF THE ISSUE TO BE
PRESENTED ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Appellee Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. § 78aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, by and through his undersigned counsel, respectfully submits the following counter-designation of additional items to be included in the record on appeal (the “Counter-Designation”) and counter-statement of the issue to be presented on appeal (the “Counter-Statement”) in connection with the appeal filed by Claimants-Appellants from the Memorandum Decision and Order Granting Trustee’s Motion to Affirm Trustee’s Determinations Denying Claims of Claimants Without BLMIS Accounts in Their Names, Namely, Investors in Feeder Funds (the “Order”) entered on June 28, 2011, by the United States Bankruptcy Court for the Southern District of New York (Lifland, J.) (ECF No. 4193).

**COUNTER-DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL**

The Trustee hereby counter-designates the following additional items to be included in the record on appeal:

Adv. Pro. No. 08-1789 (BRL) ECF No.	Docket Item Description
209	Statement Regarding Proof of Claim filed by Helen Chaitman on behalf of Stanley Hirschhorn, Carla Hirschhorn. (Chaitman, Helen) (Entered: 05/19/2009)
264	Statement Regarding Proof of Claim filed by Helen Chaitman on behalf of Judith Whitman. (Chaitman, Helen) (Entered: 06/12/2009)
265	Statement Regarding Proof of Claim filed by Helen Chaitman on behalf of Bernard Whitman. (Chaitman, Helen) (Entered: 06/12/2009)
273	Statement Regarding Proof of Claim filed by Helen Chaitman on behalf of L & C Harwood, Trustees, CRT FBO Leslie Ehrlich. (Chaitman, Helen) (Entered: 06/16/2009)
277	Statement Regarding Proof of Claim filed by Helen Chaitman on behalf of Stephen Ehrlich, Leslie Ehrlich. (Chaitman, Helen) (Entered: 06/18/2009)
364	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Elaine Glodstein. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B# 3 Exhibit Exhibit C) (Chaitman, Helen) (Entered: 08/13/2009)
470	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin Lifton. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B) (Chaitman, Helen) (Entered: 09/26/2009)
478	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Norman Feinberg, Sondra Feinberg. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B) (Chaitman, Helen) (Entered: 09/29/2009)
508	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of David N. Glodstein, Susan L. Glodstein. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B) (Chaitman, Helen) (Entered: 10/13/2009)
510	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Cynthia B. Avergon, Brad E. Avergon. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B) (Chaitman, Helen) (Entered: 10/13/2009)
523	Objection To Trustee's Claim Determination filed by Iris B. Sandberg, Joel B. Sandberg. (Ebanks, Liza) (Entered: 10/16/2009)
565	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Morrey Berkwitz. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
566	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Henry R. Bessell Trust. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
568	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Leslie Ehrlich, Stephen Ehrlich. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
570	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of The Estelle Harwood Family Limited Partnership. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)

571	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of The Sanford Harwood Family Limited Partnership. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
572	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Irving Jungreis, Annette Jungreis, Annette Jungreis Trust. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
573	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Irving Jungreis Trust, Annette Jungreis, Irving Jungreis. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
575	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Myrna Kohl, Kenneth M. Kohl. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
576	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Danessa Miller, Steven F. Miller, Miller Family Partnership, EDM Trust #1 dated September 3, 1992. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
579	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of The Whitman Partnership. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/02/2009)
604	Objection to Trustee's Determination of Claim (Corrected) filed by Helen Chaitman on behalf of Henry R. Bessell Trust. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
607	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Grace Mishkin. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
608	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Julia Mishkin, Ellen Mishkin, William Mishkin, Mishkin Family Trust. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
610	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Pamela Preffer, Shirley Preffer, Samuel Preffer. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
611	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Linda S. Rosenthal, Alan H. Rosenthal. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
615	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Gunther K. Unflat. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)
616	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of WDG Associates Inc. Retirement Trust. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/04/2009)

639	Objection to Investment Determination of Claim filed by Helen Chaitman on behalf of Robert J. Allen, Jeffrey H. Allen, Cathy J. Meyer, Laurel Allen, Allen Family Trust, Paul Allen. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/06/2009)
640	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Richard M. Gaba, Barbara K. Gaba, Gaba Partnership. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/06/2009)
643	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Elaine Glodstein Revocable Trust, Sidney Glodstein, Elaine Glodstein. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/06/2009)
649	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin R. Harnick and Stephen P. Norton, Partners. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/06/2009)
675	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Theodore Arenson, Cynthia Arenson. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
677	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Jacqueline Avergon, Robert Avergon. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
681	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Rita English, Alan English. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
684	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Lori Gross Heyle, Mindy Gross, Herb Gross, Gross Associates. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
688	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin Miller Living Trust, Alice
691	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Roberta Plateis, Marvin Plateis. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
694	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Thomas A. Sherman. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
695	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Christopher George, Allison George, Linda Wohl, Wohl George Partners LP. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2009)
700	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Leonard Forrest Revocable Trust, Leonard Forrest, Margaret Forrest. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/11/2009)

702	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Kuntzman Family LLC. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/11/2009)
704	Objection to Trustee's Determination of Claim Amended filed by Helen Chaitman on behalf of Gunther K. Unflat. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/11/2009)
719	Objection to Trustee's Determinatin of Claim Amended filed by Helen Chaitman on behalf of Alan English, Rita English. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/12/2009)
721	Objection to Trustee's Determination of Claim Amended filed by Helen Chaitman on behalf of Marjorie Forrest, Leonard Forrest, Leonard Forrest Revocable Trust. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/12/2009)
724	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Catherine Rosenthal, Robert R. Rosenthal, R. R. Rosenthal Associates. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/12/2009)
746	Response to trustee's determination of claim filed by Peter Benzaia. (Chou, Rosalyn) (Entered: 11/13/2009)
832	Objection to Trustee's Determinatin of Claim filed by Helen Chaitman on behalf of Nancy Dver-Cohen. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/16/2009)
833	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ralph Cohen, Nancy Dver-Cohen Revocable Trust, Nancy Dver-Cohen. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/16/2009)
847	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Peter Benzaia, Olga Krakauer. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/17/2009)
893	Objection to Trustee's Determination of Claim filed by Jonathan M. Landers on behalf of Gary L. Harnick. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Certificate of Service) (Landers, Jonathan) (Entered: 11/18/2009)
901	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ronald Weinstein, Sheryl Weinstein. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/18/2009)
902	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Sheryl Weinstein as Executrix of the Estate of Edith Wasserman. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/18/2009)
908	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Lee Hirsch, Robert Hirsch. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/18/2009)

942	Objection to Trustee's Determination of Claim Amended filed by Helen Chaitman on behalf of Herb Gross, Mindy Gross, Gross Associates, Lori Gross Heyle. (Attachments: # 1 Exhibit Exhibit A) (Chaitman, Helen) (Entered: 11/18/2009)
999	Objection to trustee's determination of claim filed by Steven Kurland, Renee Kurland. (Chou, Rosalyn) (Entered: 11/23/2009)
1023	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Breier Group. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/30/2009)
1025	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Stanley Hirschhorn, Carla Hirschhorn. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/30/2009)
1027	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Donna Schaffer, Jeffrey Schaffer. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/30/2009)
1031	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Peerstate Equity Fund L.P.. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 12/01/2009)
1032	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Keith Schaffer. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/01/2009)
1037	Objection to Trustee's Determination of Claim filed by Brian Maddox on behalf of Fox Family Partnership, LLC. (Attachments: # 1 Exhibit A# 2 Exhibit B) (Maddox, Brian) (Entered: 12/06/2009)
1038	Objection to Trustee's Determinatin of Claim filed by Helen Chaitman on behalf of Jared Lazarus, Michael Lazarus, Zipora Lazarus, Lazarus Schy Family Partnership. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/07/2009)
1039	Objection to Trustee's Determinatin of Claim filed by Helen Chaitman on behalf of Elan Schy, Steven Schy and Family, Doron Schy and Family, Lisa Schy, Abe Schy, Ira Schy, Rose Schy, Schy Family Partnership, Zipora Lazarus. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/07/2009)
1064	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Marjorie Forrest Revocable Trust, Leonard Forrest, Marjorie Forrest. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2009)
1085	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ronald Lazarus, Adam Lazarus, Audra Lazarus, Amber Lazarus, Linda Lazarus, Lazarus Investment Group, Zipora Lazarus. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/17/2009)
1129	Response to trustee's determination of claim filed by Maxine S. Stewart. (Chou, Rosalyn) (Entered: 12/28/2009)

1132	Objection to trustee's determination of claim filed by Cindy Wallick. (Chou, Rosalyn) (Entered: 12/28/2009)
1141	Objection to trustee's determination of claim filed by Robert S. Goodman on behalf of Esteban Herrera. (Attachments: # 1 Exhibit Exhibits A-C to objection to trustee's determination of claim) (Goodman, Robert) (Entered: 12/30/2009)
1167	Opposition to Trustee's Determination of Claim for Claim Nos. 006842 and 006843 filed by Sheryl Weinstein. (Bush, Brent) (Entered: 01/04/2010)
1172	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Heidi Hiles. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1173	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ronald M. Lazarus. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1174	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Linda Lazarus, Ronald Lazarus. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1175	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Gaetano Macaluso. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1176	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Rosalinda Macaluso. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1179	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Nicholas Rosamilia, Neva Rosamilia. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1180	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of George Rubin. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1181	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Susan Eisenstat, Henry Siegman. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/05/2010)
1204	Objection and Opposition to Trustee Picard's Determination of Claims filed by Richard L. Brittain on behalf of Sean Stepelton, Douglas Stepelton Trust, Douglas & Virlee Stepelton, Brett & Jennifer Stepelton, Stepelton Advisors, Inc., Patrick & Patricia Cooney, Sharon Falls Bizzell, Gary Bizzell. (Attachments: # 1 Exhibit # 2 Certificate of Service) (Brittain, Richard) (Entered: 01/05/2010)
1241	Objection to trustee's determination of claim filed by James P. Dulany. (Chou, Rosalyn) (Entered: 01/06/2010)
1242	Objection to trustee's determination of claim filed by Jan Feldman. (Chou, Rosalyn) (Entered: 01/06/2010)
1243	Objection to trustee's determination of claim filed by Robert H. Scott and Molly MacNaughton. (Chou, Rosalyn) (Entered: 01/06/2010)
1244	Objection to trustee's determination of claim filed by Martha L. Wood. (Chou, Rosalyn) (Entered: 01/06/2010)

1246	Objection to trustee's determination of claim filed by Donald H. Hangen. (Chou, Rosalyn) (Entered: 01/06/2010)
1247	Objection to trustee's determination of claim filed by Markian D. Stecyk. (Chou, Rosalyn) (Entered: 01/06/2010)
1248	Objection to trustee's determination of claim filed by Harvey A. Taylor. (Chou, Rosalyn) (Entered: 01/06/2010)
1249	Objection to trustee's determination of claim filed by Lee F. Wood. (Chou, Rosalyn) (Entered: 01/06/2010)
1250	Objection to trustee's determination of claim filed by Marshall G. Rowe. (Chou, Rosalyn) (Entered: 01/06/2010)
1251	Objection to trustee's determination of claim filed by Sally S. Beaudette. (Chou, Rosalyn) (Entered: 01/06/2010)
1252	Objection to trustee's determination of claim filed by Thomas and Margaret H. Brown. (Chou, Rosalyn) (Entered: 01/06/2010)
1254	Objection to trustee's determination of claim filed by Charles F. Rolecek. (Chou, Rosalyn) (Entered: 01/06/2010)
1257	Objection to trustee's determination of claim filed by Henry T. DeNero and Nancy S. DeNero. (Chou, Rosalyn) (Entered: 01/06/2010)
1258	Objection to Trustee's Determination of Claim filed by Corrine G. Playso. (Gadson, Carol) (Entered: 01/06/2010)
1260	Objection to trustee's determination of claim filed by James L. Kruse. (Chou, Rosalyn) (Entered: 01/06/2010)
1290	Objection to trustee's determination of claim filed by Joyce Forte, Bruce Cummings and Lynn Cummings. (Chou, Rosalyn) (Entered: 01/06/2010)
1292	Objection to Trustee's Determination of Claim filed by Independant Financial Partners AG - Dr. Johanna von Braun and Andrea von Braun Stiftung. (Attachments: # 1 Dr. Kaspar von Braun and Andrea von Braun Stiftung# 2 Raymond Porchet# 3 Rene Ernsth# 4 Carlos Ammann# 5 Daniel von Braun and Andrea von Braun Stiftung# 6 Isa Dorothea Hoppenstedt# 7 Porkar Privatstiftung# 8 Eva Schatti# 9 Dr. Daniel Schatti# 10 Hans Ulrich Benz# 11 Mag. Margit Widinski# 12 Peter Rischl# 13 Dr. Helga Wagenmann# 14 Tiroler Landhaus Privatstiftung# 15 Ursula Schulz-Dornburg# 16 Dr. Friedrich Nemec) (Rouzeau, Anatin) (Entered: 01/06/2010)
1354	Objection to trustee's determination of claim filed by Brenda J. Chapman. (Chou, Rosalyn) (Entered: 01/07/2010)
1356	Objection to trustee's determination of claim filed by Scott S. Patience. (Chou, Rosalyn) (Entered: 01/07/2010)
1385	Objection to trustee's determination of claim filed by Gerald Login. (Chou, Rosalyn) (Entered: 01/07/2010)

1394	Objection to Motion Objection of William Korb IRA, Roger A. Enrico IRA, Charles & Miriam Wood Charitable Remainder Trust U/A 12803, John E. Guinness Revocable Trust Dtd. 6/11/92, Raymond M. Murphy, and Peter A. Carfegna Charitable Remainder Trust to Trustee's Determination of Claim filed by Jil Mazer-Marino on behalf of Peter A. Carfegna Charitable Remainder Trust, Raymond M. Murphy, John E. Guinness Revocable Trust Dtd. 6/11/92, Charles & Miriam Wood Charitable Remainder Trust U/A 12803, Roger A. Enrico IRA, William B. Korb IRA. (Attachments: # 1 Certificate of Service) (Mazer-Marino, Jil) (Entered: 01/07/2010)
1412	Objection to trustee's determination of claim as a member of Greene-Lederman LLC filed by Hermene Schrager, Roy Schrager. (Chou, Rosalyn) (Entered: 01/07/2010)
1416	Objection to trustee's determination of claim as a member of Greene-Lederman, LLC filed by Annette Daniels. (Chou, Rosalyn) (Entered: 01/07/2010)
1439	Objection to Determination of Claim of Oversea Chinese Bank Nominees PTE Ltd. filed by Karen Ostad on behalf of Oversea Chinese Bank Nominees PTE Ltd.. (Ostad, Karen) (Entered: 01/07/2010)
1441	Objection to Determination of Claim of Booming Inversiones S.I.C.A.V., S.A. filed by Karen Ostad on behalf of Booming Inversiones S.I.C.A.V., S.A.. (Ostad, Karen) (Entered: 01/07/2010)
1443	Objection to Determination of Claim of Gassolans Inversiones S.I.C.A.V., S.A. filed by Karen Ostad on behalf of Gassolans Inversiones S.I.C.A.V., S.A.. (Ostad, Karen) (Entered: 01/07/2010)
1445	Objection to Determination of Claim of Hathor Invest S.I.C.A.V., S.A. filed by Karen Ostad on behalf of Hathor Invest S.I.C.A.V., S.A.. (Ostad, Karen) (Entered: 01/07/2010)
1447	Objection to Determination of Claim of Inversiones Lutimo S.I.C.A.V., S.A. filed by Karen Ostad on behalf of Inversiones Lutimo S.I.C.A.V., S.A.. (Ostad, Karen) (Entered: 01/07/2010)
1448	Objection to Determination of Claim of Privat Fondos Global F.I. filed by Karen Ostad on behalf of Privat Fondos Global F.I.. (Ostad, Karen) (Entered: 01/07/2010)
1449	Objection to Determination of Claim of Shilling Inversiones S.I.C.A.V., S.A. filed by Karen Ostad on behalf of Shilling Inversiones S.I.C.A.V., S.A.. (Ostad, Karen) (Entered: 01/07/2010)
1499	Objection to trustee's determination of claim filed by Angels Park Management SA. (Chou, Rosalyn) (Entered: 01/07/2010)
1550	Objection to trustee's determination of claim No. 003962 filed by Robert and Suzanne Plati. (Chou, Rosalyn) (Entered: 01/08/2010)
1551	Objection to trustee's determination of claim No. 003981 filed by Suzanne K. Plati. (Chou, Rosalyn) (Entered: 01/08/2010)
1562	Objection to trustee's determination of claim No. 004523 filed by Colson H. Hillier Jr. IRA. (Chou, Rosalyn) (Entered: 01/08/2010)

1566	Objection to Motion /Amended Objection Of William B. Korb IRA, Roger A. Enrico IRA, Charles & Miriam Wood Charitable Remainder Trust U/A 12803, John E. Guinness Revocable Trust Dtd. 6/11/92, Raymond M. Murphy, And Peter A. Carfegna Charible Remainder Trust To Trustee's Determination Of Claim [Amending Docket Entry No. 1394] filed by Jil Mazer-Marino on behalf of Charles & Miriam Wood Charitable Remainder Trust U/A 12803, John E. Guinness Revocable Trust Dtd. 6/11/92, Peter A. Carfegna Charitable Remainder Trust, Raymond M. Murphy, Roger A. Enrico IRA, William B. Korb IRA. (Attachments: # 1 Certificate of Service) (Mazer-Marino, Jil) (Entered: 01/08/2010)
1571	Objection to trustee's determination of claim filed by Jane Gray Solomon Trust. (Chou, Rosalyn) (Entered: 01/08/2010)
1572	Objection to trustee's determination of claim filed by David W. Stepelton Family Trust. (Chou, Rosalyn) (Entered: 01/08/2010)
1573	Objection to trustee's determination of claim filed by Natale Barbara Trust F/B/O Mary Barbara and S&P Asspcoates, Gereral Partnership. (Chou, Rosalyn) (Entered: 01/08/2010)
1574	Objection to trustee's determination of claim filed by Matthew F.V. Jacob. (Chou, Rosalyn) (Entered: 01/08/2010)
1622	Objection to trustee's determination of claim filed by Edith A. Pillsbury. (Chou, Rosalyn) (Entered: 01/08/2010)
1632	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Henry Siegman. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/11/2010)
1679	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Guardian Angel Trust LLC and All of Its Members. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 01/11/2010)
1694	Objection to trustee's determination of claim filed by Sam & Edith Rosen. (Chou, Rosalyn) (Entered: 01/12/2010)
1855	Objection to Trustee's Determination of Claim filed by Jonathan M. Landers on behalf of The Harnick Brothers Partnership. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Certificate of Service) (Landers, Jonathan) (Entered: 02/04/2010)
1868	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Jerome Haber. (Chaitman, Helen) (Entered: 02/06/2010)
1869	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ronald J Haber. (Chaitman, Helen) (Entered: 02/06/2010)
1872	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Susan D. Labriola, Ellen Leeds, Denton Family Irrevocable Trust. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 02/08/2010)

1874	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Barry Wilansky, David Wilansky, Steven Wilansky, Wilansky Family Fund. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 02/08/2010)
2074	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Rabb Partners. (Attachments: # 1 Exhibit Exhibit A# 2 Exhibit Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 03/23/2010)
2075	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Carla Hirschhorn, Jeffrey Schaffer, Keith Schaffer. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 03/23/2010)
2113	Objection Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Gunther K. Unflat, Margaret Unflat. (Attachments: # 1 Exhibit Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 03/30/2010)
2138	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Donna Schaffer, Jeffrey Schaffer. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 04/06/2010)
2139	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Andrea Blaine, Colleen Shapiro, Richard Shapiro, Winco Real Estate SVC DBPP. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 04/06/2010)
2184	Opposition to trustee's determination of claim (Document Initially Filed With Trustee Irving Picard on 3/24/10) filed by Black River Associates LP. (Attachments: # 1 Exhibit A(Response by Bik Cheema of Baker Hosteler dated April 7, 2010) (Chou, Rosalyn) (Entered: 04/09/2010)
2206	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Savest Ltd. and each of its members. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 04/13/2010)
2217	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Allen Gordon. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 04/20/2010)
2290	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin R. Harnick and Stephen P. Norton, Partners. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 05/19/2010)
2345	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Savest Ltd. and each of its members. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 05/28/2010)
2354	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Adele Fox. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 06/02/2010)

2385	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin Lifton. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 06/08/2010)
2468	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Greene/Lederman LLC and each of its members. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 06/24/2010)
2475	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Northeast Investment Club and each of its members. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 06/25/2010)
2531	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Boyer Palmer. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 07/08/2010)
2826	Opposition to trustee's determination of claim #011415 filed by Radosh Partners. (Chou, Rosalyn) (Entered: 08/02/2010)
3051	Objection to Investment Determination of Claim filed by Helen Chaitman on behalf of Jeffrey H. Allen, Laurel Allen, Paul Allen, Robert J. Allen, Allen Family Trust, Cathy J. Meyer. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 10/20/2010)
3094	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Carol A. Kozloff. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/03/2010)
3123	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Martin R. Harnick and Stephen P. Norton, Partners. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Certificate of Service) (Chaitman, Helen) (Entered: 11/05/2010)
3140	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Alice G. Miller Exemption Trust, Alice G. Miller Marital Trust, Martin Miller Living Trust, Miller Trust Partnership. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/10/2010)
3170	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Gloria S. Jaffe Family Partnership and each of its Partners. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 11/12/2010)
3186	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Peerstate Equity Fund L.P. and each of its participants. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 11/16/2010)
3188	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Donna Schaffer, Jeffrey Schaffer. (Attachments: # 1 Certificate of Service) (Chaitman, Helen) (Entered: 11/17/2010)
3189	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Carla Hirschhorn, Jeffrey Schaffer, Keith Schaffer. (Attachments: # 1 Certificate of Service) (Chaitman, Helen) (Entered: 11/17/2010)

3192	Opposition to trustee's determination of claim #014899 filed by Jeremy L. Radosh. (Chou, Rosalyn) (Entered: 11/17/2010)
3196	Opposition to trustee's determination of claim #014896 filed by Katherine M. Radosh. (Chou, Rosalyn) (Entered: 11/19/2010)
3197	Opposition to trustee's determination of claim #014897 filed by Burnett H. Radosh. (Chou, Rosalyn) (Entered: 11/19/2010)
3198	Opposition to trustee's determination of claim #014898 filed by Burnett H. Radosh. (Chou, Rosalyn) (Entered: 11/19/2010)
3230	Opposition to trustee's determination of claim filed by Laura Radosh Butt. (Chou, Rosalyn) (Entered: 11/22/2010)
3231	Opposition to trustee's determination of claim filed by Lee J. Radosh. (Chou, Rosalyn) (Entered: 11/22/2010)
3414	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of James Reynolds, J.X. Reynolds & Co. Deferred Profit Sharing Plan. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/13/2010)
3415	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Olivia McKean. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/13/2010)
3416	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Bernard and Judith Whitman As Partners of the Whitman Partnership. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/13/2010)
3498	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Adele Fox. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2010)
3499	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Jennifer Gattegno, Ethan Siegel, Judith Gattegno, Jacqueline Green, Wayne Green, Kuntzman Family LLC. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2010)
3500	Objection Amended Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Olivia McKean. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2010)
3501	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Danessa Miller, Steven F. Miller, Miller Family Partnership, EDM Trust #1 dated September 3, 1992. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2010)
3502	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Fern C. Palmer and Boyer H. Palmer, Trustees of the Palmer Revocable Trust. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/15/2010)
3508	Objection Amended Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Fern C. Palmer and Boyer H. Palmer, Trustees of the Palmer Revocable Trust. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/16/2010)

3532	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Ellen Danessa Miller, Steven F. Miller. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/17/2010)
3534	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of William Pressman. (Attachments: # 1 Exhibit A# 2 Certificate of Service) (Chaitman, Helen) (Entered: 12/17/2010)
3535	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of William Pressman Inc. and each of its Investors. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 12/17/2010)
3549	Objection Withdrawal of Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Savest LTD, and each of its members. (Attachments: # 1 Certificate of Service) (Chaitman, Helen) (Entered: 12/21/2010)
3597	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Jared Lazarus, Michael Lazarus, Zipora Lazarus, Lazarus Schy Family Partnership. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 12/28/2010)
3598	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Zipora Lazarus, Ronald Lazarus, Adam Lazarus, Audra Lazarus, Amber Lazarus, Linda Lazarus, Lazarus Investment Group. (Attachments: # 1 Exhibit A# 2 Index B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 12/28/2010)
3599	Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Elan Schy, Steven Schy and Family, Doron Schy and family, Lisa and Abe Schy, Rose and Ira Schy, Zipora Lazarus, Schy Family Partnership. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Certificate of Service) (Chaitman, Helen) (Entered: 12/28/2010)
3801	Objection Amended Objection to Trustee's Determination of Claim filed by Helen Chaitman on behalf of Peerstate Equity Fund L.P. and each of its participants. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Certificate of Service) (Chaitman, Helen) (Entered: 01/25/2011)
3813	Motion for Objection to Claim(s) Number: 4727 and 100366 filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles.(Quinn, Dennis) (Entered: 01/31/2011)
3841	Objection to Motion To The Trustees Determinations Of The Claims Of Claimants Whose Funds Were Invested With BLMIS Through An Investment Pool Maintained And Administered By The Jewish Community Foundation Of The Jewish Federation Council Of Greater Los Angeles filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles. (Attachments: # 1 Exhibit Exh. A# 2 Exhibit Exh. B (part 1)# 3 Exhibit Exh. B (part 2)# 4 Exhibit Exh. C# 5 Exhibit Exh. D) (Quinn, Dennis) (Entered: 02/10/2011)

3842	Declaration OF Michael J. Januzik In Support Of Objections To The Trustees Determinations Of The Claims Of Claimants Whose Funds Were Invested With BLMIS Through An Investment Pool Maintained And Administered By The Jewish Community Foundation Of The Jewish Federation Council Of Greater Los Angeles filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles. (Quinn, Dennis) (Entered: 02/10/2011)
3843	Declaration OF MICHAEL J. JANUZIK, Exhibits A, B and C filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles. (Attachments: # 1 Exhibit Exh. B (part 1)# 2 Exhibit Exh. B (part 2)# 3 Exhibit Exh. C) (Quinn, Dennis) (Entered: 02/10/2011)
3940	Notice of Withdrawal of JCF Objection to Trustee's Determination (related document(s) 3813) filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles. (Quinn, Dennis) (Entered: 03/15/2011)
3941	Notice of Withdrawal of Claimants' Objections to Trustee's Determinations of Claims (related document(s) 3841) filed by Dennis C. Quinn on behalf of Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles. (Quinn, Dennis) (Entered: 03/15/2011)
3944	Opposition and objection to Claim of Harmony Partners, Ltd. filed by Frank C. Leonard. (Chou, Rosalyn) (Entered: 03/16/2011)
4068	Objection to Trustee's Determination of Claims on Behalf of Bricklayers and Allied Craftsmen Local 2 Annuity Fund, Bricklayers and Allied Craftworkers Local 2, Albany, New York, Pension Fund, Central New York Laborers Annuity Fund, Central New York Laborers Pension Fund, International Brotherhood of Electrical Workers Local Union No. 43 and Electrical Contractors Pension Fund, I.B.E.W. Local 139 Pension Fund, I.B.E.W. Local 241 Pension Fund, I.B.E.W. Local 325 Annuity Fund, I.B.E.W. Local 325 Pension Fund, I.B.E.W. Local 910 Annuity Fund, I.B.E.W. Local 910 Pension Fund, I.B.E.W. Local 1249 Pension Fund, Laborers Local 103 Annuity Fund, Laborers Local 103 Pension Fund, Local 73 Annuity Fund, Local 73 Retirement Fund, Oswego Laborers Local 214 Pension Fund, Roofers Local 195 Pension Fund, Roofers Local 195 Annuity Fund, SEIU 1199Upstate Pension Fund, Service Employees of Upstate New York Pension Fund and Syracuse Builders Exchange, Inc./CEA Pension Plan filed by Jennifer A. Clark on behalf of Jennifer A. Clark. (Attachments: # 1 Exhibit Affidavit of Jennifer A. Clark# 2 Exhibit A, Part 1, Customer Claims# 3 Exhibit A, Part 2, Customer Claims# 4 Exhibit B, Trustee's Denial# 5 Exhibit C, Objectors' Form 5500s# 6 Exhibit D, Jeanneret v. Mantello Complaint# 7 Exhibit E, Income Plus Offering Memorandum# 8 Certificate of Service) (Clark, Jennifer) (Entered: 05/16/2011)

4070	Objection to Trustee's Determination of Claims on Behalf of Bricklayers and Allied Craftsmen Local 2 Annuity Fund, Bricklayers and Allied Craftworkers Local 2, Albany, New York, Health Benefit Fund, Building Trade Employers Insurance Fund, Central New York Laborers Annuity Fund, Central New York Laborers Health and Welfare Fund, Central New York Laborers Pension Fund, Central New York Laborers Training Fund, Engineers Joint Welfare Fund, Engineers Joint Training Fund, International Brotherhood of Electrical Workers Local Union No. 43 and Electrical Contractors Pension Fund, International Brotherhood of Electrical Workers Local No. 43 and Electrical Contractors Welfare Fund, I.B.E.W. Local 241 Welfare Benefits Fund, I.B.E.W. Local 910 Welfare Fund, Laborers Local 103 Annuity Fund, Laborers Local 103 Welfare Fund, New York State Linemans Safety Training Fund, Oswego Laborers Local No. 214 Pension Fund, Plumbers, Pipefitters and Apprentices Local No. 112 Health Fund, Roofers Local 195 Annuity Fund, Roofers Local 195 Health & Accident Fund, Syracuse Builders Exchange, Inc./CEA Pension Plan, Service Employees Benefit Fund, Service Employees Pension Fund of Upstate New York, and Local 73 Retirement Fund filed by Jennifer A. Clark on behalf of Jennifer A. Clark. (Attachments: # 1 Affidavit of Jennifer A. Clark# 2 Exhibit A, Part 1, Customer Claims# 3 Exhibit A, Part 2, Customer Claims# 4 Exhibit A, Part 3, Customer Claims# 5 Exhibit B, Trustee's Denial# 6 Exhibit C, Objectors' Form 5500s# 7 Exhibit D, Andover and Beacon Form 5500s# 8 Exhibit E, Andover Offering Memorandum# 9 Exhibit F, Beacon Offering Memoranda# 10 Exhibit G, Beacon Letter Dated December 17, 2010# 11 Certificate of Service) (Clark, Jennifer) (Entered: 05/16/2011)
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COUNTER-STATEMENT OF THE ISSUES TO BE PRESENTED ON APPEAL

The Trustee hereby submits the following counter-statement of the issue on appeal:

Whether the bankruptcy court properly affirmed the Trustee's determination that certain claimants ("Objecting Claimants") do not qualify as "customers" of Bernard L. Madoff Investment Securities ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, where the Objecting Claimants did not maintain securities accounts at BLMIS, did not entrust cash or securities to BLMIS, did not execute Account Agreements with BLMIS, did not receive account documentation from BLMIS, and, instead, purchased ownership interests in and yielded the exclusive right to make all decisions concerning investments and other

disposition of assets to investment vehicles (referred to as “feeder funds”) that had direct or indirect accounts and entrusted fund-owned assets with BLMIS.

Dated: New York, New York
August 5, 2011

Respectfully submitted,

/s/ David J. Sheehan

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Investment Securities LLC and Bernard L.
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